UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:

SYRACUSE MOUNTAINS CORPORATION,

Plaintiff,

Docket No.: 1:21-cv-02684-VEC

DATE FILED: 1/24/22

v.

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

ORDER REGARDING DISCLOSURE OF INFORMATION RELATING TO PLAINTIFF'S ULTIMATE BENEFICIAL OWNERS

On January 21, 2022, the Court held a telephonic conference in this matter and heard oral submissions from both parties on a discovery dispute concerning the disclosure of information relating to Plaintiff Syracuse Mountains Corporation's shareholders and ultimate beneficial owners.

Having considered the parties' oral submissions, the Court ORDERS that:

- 1. Plaintiff must disclose to Defendant's outside counsel the full names of the individuals who are the ultimate beneficial owners of Plaintiff and/or its shareholders, as requested in Defendant's First Interrogatories and Defendant's First Requests for Production.
- 2. Any information or documents relating to Plaintiff's and/or its shareholders' ultimate beneficial owners and disclosed by Plaintiff to Defendant, pursuant to this Order, shall be marked as "HIGHLY CONFIDENTIAL EXTERNAL ATTORNEYS' EYES ONLY." Any information or documents disclosed, pursuant to this Order, and marked as "HIGHLY CONFIDENTIAL EXTERNAL ATTORNEYS' EYES ONLY" shall be subject to the same

Case11221eov9026844V/HEC Dibooumeent3891 Filieelo011224222 Fizage22of33

restrictions as documents marked as "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

ONLY" under the Stipulated Confidentiality Agreement and Protective Order entered in this case

(Docket 30), with the additional restriction that such information may not be disclosed to the

persons identified in paragraph 6.2(b) of the Stipulated Confidentiality Agreement and Protective

Order.

3. To the extent that Defendant intends to use information marked "HIGHLY

CONFIDENTIAL – EXTERNAL ATTORNEYS' EYES ONLY" to support its defenses in this

case or any counterclaim, and failing agreement between the parties, Defendant may apply to the

Court to seek reclassification of any information marked as "HIGHLY CONFIDENTIAL -

EXTERNAL ATTORNEYS' EYES ONLY" to "HIGHLY CONFIDENTIAL – ATTORNEYS'

EYES ONLY" or "CONFIDENTIAL" under the Stipulated Confidentiality Agreement and

Protective Order.

SO ORDERED.

Date: Janu

January 24, 2022

VALERIE CAPRONI

United States District Judge

2

AGREED AS TO FORM:

By: /s/ Dennis H. Tracey

HOGAN LOVELLS US LLP

Dennis H. Tracey 390 Madison Avenue New York, NY 10017 Phone: (212) 918-3000

Fax: (212) 918-3100

Richard Lorenzo (admitted pro hac vice)

600 Brickell Avenue, Suite 2700

Miami, FL 33131

Phone: (305) 459-6500 Fax: (305) 459-6550

richard.lorenzo@hoganlovells.com

Catherine Bratic (admitted *pro hac vice*)

609 Main Street, Suite 4200

Houston, TX 77002 Phone: (713) 632-1400 Fax: (713) 632-1401

catherine.bratic@hoganlovells.com

Counsel for Defendant Petróleos de Venezuela, S.A.

By: /s/ Michael A. DeBernardis

HUGHES HUBBARD & REED LLP

Daniel H. Weiner One Battery Park Plaza New York, NY 10004 Telephone: (212) 837-6874

daniel.weiner@hugheshubbard.com

Michael A. DeBernardis (admitted pro hac vice)

Shayda Vance

1775 I Street, N.W.

Washington, D.C. 20006-2401 Telephone: (202) 721-4678

michael.debernardis@hugheshubbard.com

shayda.vance@hugheshubbard.com

Counsel for Plaintiff Syracuse Mountains Corporation